

# Iowa Department of Natural Resources

## Draft Title V Operating Permit Fact Sheet

This document has been prepared to fulfill the public participation requirements of 40 CFR Part 70 and 567 Iowa Administrative Code (IAC) 22.107(6). 40 CFR Part 70 contains operating permit regulations pursuant to Title V of the Clean Air Act.

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The Iowa Department of Natural Resources (DNR) finds that:

1. Union Tank Car, located at 2603 Industrial Connector Road, Muscatine, IA 52761, has applied to renew their Title V Operating Permit. The designated responsible official of this facility is Jake Lloyd.
2. Union Tank Car is a Rail Car Rental facility. This facility consists of 27 emission units with potential emissions of:

Pollutant	Abbreviation	Potential Emissions (Tons per Year)
Particulate Matter ( $\leq 2.5 \mu\text{m}$ )	PM <sub>2.5</sub>	3.59
Particulate Matter ( $\leq 10 \mu\text{m}$ )	PM <sub>10</sub>	17.48
Particulate Matter	PM	121.48
Sulfur Dioxide	SO <sub>2</sub>	8.03
Nitrogen Oxides	NO <sub>x</sub>	37.57
Volatile Organic Compounds	VOC	206.98
Carbon Monoxide	CO	8.58
Lead	Lead	0
Hazardous Air Pollutants <sup>(1)</sup>	HAP	144.48

<sup>(1)</sup> May include the following: Cumene, ethylbenzene, formaldehyde, glycol ethyl, methanol, methyl isobutyl ketone, naphthalene, toluene, xylene, 4,4-methylenedianiline.

3. Union Tank Car submitted a Title V Operating Permit renewal application on April 3, 2020 and any additional information describing the facility on April 3, 2020. Based on the information provided in these documents, DNR has made an initial determination that the facility meets all the applicable criteria for the issuance of an operating permit specified in 567 IAC 22.107.
4. DNR has complied with the procedures set forth in 567 IAC 22.107, including those regarding public notice, opportunity for public hearing, and notification of EPA and surrounding state and local air pollution programs.

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DNR procedures for reaching a final decision on the draft permit:

1. The public comment period for the draft permit will run from September 17, 2020 through October 17, 2020. During the public comment period, anyone may submit written comments on the permit. Mail signed comments to Zane Peters at the DNR address shown below. The beginning date of this public comment period also serves as the beginning of the U.S. Environmental Protection Agency's (EPA) 45-day review period, provided the EPA does not seek a separate review period.
2. Written requests for a public hearing concerning the permit may also be submitted during the comment period. Any hearing request must state the person's interest in the subject matter, and the nature of the issues proposed to be raised at the hearing. DNR will hold a public hearing upon finding, on the basis of requests, a significant degree of relevant public interest in a draft permit. Mail hearing requests to Zane Peters at the DNR address shown below.
3. DNR will keep a record of the issues raised during the public participation process, and will prepare written responses to all comments received. The comments and responses will be compiled into a responsiveness summary document. After the close of the public comment period, DNR will make a final decision on the renewal application. The responsiveness summary and the final permit will be available to the public upon request.

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DNR concludes that:

1. DNR has authority under 455B.133 Code of Iowa to promulgate rules contained in 567 IAC Chapters 20-35, including, but not limited to, rules containing emission limits, providing for compliance schedules, compliance determination methods and issuance of permits.
2. DNR has the authority to issue operating permits for air contaminant sources and to include conditions in such permits under 455B.134 Code of Iowa.
3. The emission limits included in this permit are authorized by 455B.133 Code of Iowa and 567 IAC Chapters 20-35.
4. DNR is required to comply with 567 IAC Chapter 22 in conjunction with issuing a Title V Operating Permit.
5. The issuance of this permit does not preclude the DNR from pursuing enforcement action for any violation.

## **Title V Application Review Notes**

Applicant:	<b>Union Tank Car Co.</b>
SIC Code:	4741 (Rental of Railroad Cars)
City:	Muscatine
County:	Muscatine (FO #6)
EIQ#:	92-5154
Facility#:	70-01-048
Permit #:	03-TV-002R3
Reviewer:	Zane Peters
Date:	07/10/2020

### **Facility Identification**

Facility Name:	Union Tank Car Co.
Facility Location:	2603 Dick Drake Way, Muscatine, IA 52761
Responsible Official:	Troy McKim

### **Background**

Union Tank Car Co. refurbishes and repairs railroad tanker cars. Steel grit blasting is used to prepare the exterior surfaces for painting and the interior of the cars for rubber liner adhesion. Repair work may also include welding. Prior to refurbishing, interiors of some of the rail cars may need to be vaporized to eliminate VOCs.

Union Tank Car Co. has been identified as one of three major sources of air pollution in the Muscatine area that significantly contributes of predicted PM<sub>2.5</sub> exceedances. The facility has recently installed mini-pleat filters to comply with the Muscatine PM<sub>2.5</sub> SIP.

The initial Title V permit for Union Tank Car Co. was issued January 3, 2003; the first renewal permit was issued June 21, 2010. This is the second renewal application for Union Tank Car Co.'s Title V operating permit. The application for renewal was received December 17, 2014.

### **Changes**

1. The Air Quality Permit Number was updated to "03-TV-002R3" on pages 1, 4, 6, 9, and in the footer.
2. The Expiration Date and Renewal Application Deadline were also updated (pp. 1)
3. The signature block was updated to include "Marnie Stein, Supervisor ...." (pp.1).
4. Initials in the footer were changed to "ZLP."
5. Correspondence with the permit contact on 07/08/2020 established that no changes had been made to the facility since the last renewal period. After careful review of the construction permit files and the PTE tables, it was confirmed that no changes have been made since the last TV Permit was issued.
6. The required monthly and semi-annual baghouse inspections were removed from Emission Points 1, 2, and 3 as per request from the facility and supervisor approval. These baghouses will now just require a quarterly inspection that include all the components of the previous monthly, quarterly, and semi-annual inspections except

checking the cleaning sequence of the baghouse, which was removed completely (pp. 12-23).